COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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An Investigation by the Department of	f)	
Telecommunications and Energy Rega	arding)	Docket No. D.T.E. 98-32-B
the Assignment of Interstate Pipeline)	
Capacity Pursuant to)	
Natural Gas Unbundling)	
)	

PETITION FOR LIMITED PARTICIPANT STATUS OF DOMINION TRANSMISSION, INC.

Dominion Transmission, Inc. ("DTI"), pursuant to 220 C.M.R. 1.03, hereby petitions the Department of Telecommunications and Energy ("Department") for limited participant status in the above-captioned proceeding. In support of this request, DTI states the following:

- DTI is a Delaware corporation with its principal place of business located at 120 Tredegar Street, Richmond, Virginia 23219.
- 2. DTI is engaged primarily in the business of storing and transporting natural gas in interstate commerce for customers principally in New York, Ohio, Pennsylvania, West Virginia, Virginia, Maryland and the District of Columbia. DTI is also an upstream service provider to Massachusetts Local Distribution Companies ("LDCs").
- 3. The captioned proceeding is an investigation to determine whether the upstream capacity market $\frac{1}{2}$ is sufficiently competitive to warrant the Department

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The Department defines "upstream capacity market" in this proceeding as the "market for gas commodity and transport capacity resources on the interstate natural gas pipeline system up to the 'citygate' receipt point of physical interconnection between a G.L. c. 164 gas company and the interstate system." D.T.E. 98-32-B, Order at n. 1 (Jan. 12, 2004).

allowing the voluntary assignment of interstate pipeline capacity rights by G.L. c. 164 gas companies to other entities. By order dated January 12, 2004, the Department requested comments regarding the assignment of interstate pipeline capacity.

- 4. As an upstream service provider to LDCs, DTI has a substantial interest in this proceeding in which the upstream capacity market will be considered.
- 5. DTI's limited participant status will not jeopardize the Department's review, and, as this proceeding is an uncontested matter and there are no parties or intervenors, no party will be prejudiced or otherwise harmed by granting DTI participant status.
- 6. DTI's interests are unique and cannot be adequately represented by any other party.
- 7. Accordingly, DTI seeks to take part as a limited participant in this case and, where appropriate, to file comments attend and participate in technical conferences, submit briefs, and to participate in this proceeding in any other manner deemed appropriate for limited participants by the Department.
- 8. All correspondence and communications concerning this proceeding should be sent to:

Bob Phillips Dominion Transmission, Inc. 120 Tredegar Street; 6th Floor Richmond, VA 23219 (804) 819-2817 (tel) (804) 819-2062 (fax)

DTI requests that this name be added to the official service list in this docket.

Wherefore, DTI respectfully requests that the Department grant this Petition for Limited Participant Status.

Respectfully submitted,

Georgia B. Carter, Esq.
Dominion Resources, Inc.
120 Tredegar Street
Richmond, VA 23219
(804) 819-2404 (tel)
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georgia_b._carter@dom.com

Dated this 27th day of February, 2004

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day caused the foregoing Petition for Limited Participant Status of Dominion Transmission, Inc. to be served upon each person designated on the official service list compiled by the Secretary in this proceeding, Docket No. D.T.E. 98-32-B.

Dated this 27th day of February 2004.

Georgia B. Carter, Esq. Dominion Resources, Inc. 120 Tredegar Street Richmond, VA 23219